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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAKEISHA JUNIEL,

Plaintiff,

vs.

ASLEDIN EJERSO; ASAL CARGO LLC;
DOES I through XX, inclusive; and ROE
BUSINESS ENTITIES I through XX,
inclusive,

Defendants.

CASE NO.: 2:25-cv-00008-CDS-DJA

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

Special Scheduling Review Requested

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1(b), Plaintiff LAKEISHA JUNIEL, and Defendants ASLEDIN EJERSO and ASAL CARGO LLC (“Defendants”), by and through their respective counsels of record, hereby submit this Stipulated Discovery Plan and Scheduling Order.

1. Fed.R.Civ.P. 26(f) Conference. Counsel for the parties participated in a Rule 26 Discovery Conference on January 27, 2025. The conference was attended by Joseph C. Chu, Esq., for Plaintiff and Sean Deroest, Esq. for Defendants. At the conference, there were no discovery disputes at that time. The parties agree to exchange their disclosure statements in a timely manner. Counsel are requesting 8 months to complete discovery and be prepared for trial. More specifically, counsel requests 240 days from the date of removal to complete discovery. Counsel requests 60 additional days to complete discovery due to Plaintiff’s continued medical

1 treatment, including lumbar artificial disc replacement surgery, which is currently scheduled for
2 March 12, 2025 with Dr. Jason Garber.

3 Based upon the above, the parties request 8 months for discovery under the discovery
4 schedule set forth below:

5 2. **DISCOVERY CUT-OFF DATE.** The parties are requesting 240 days for
6 discovery from January 2, 2025, the date of removal. Thus, the parties request a discovery cut-
7 off date of **September 2, 2025.**

8 3. **LAST DAY TO AMEND PLEADINGS AND/OR ADD PARTIES.** The
9 parties request that all motions to amend the pleadings or to add parties be filed no later than
10 **June 4, 2025** – 90 days prior to the proposed close of discovery.

11 4. **DISCLOSURE OF EXPERTS.** The parties request the disclosure of experts be
12 made on or before **July 7, 2025** – 60 days before the proposed discovery cut-off date. Disclosure
13 of rebuttal experts shall be made by **August 6, 2025** – 30 days after the initial disclosure of
14 experts.

15 5. **DISPOSITIVE MOTIONS.** The date for filing dispositive motions shall be no
16 later than **October 2, 2025** – 30 days after the proposed discovery cut-off date. In the event that
17 the discovery period is extended from the discovery cut-off date set forth in this proposed
18 Discovery Plan and Scheduling Order, the date for filing dispositive motions shall be extended to
19 be not later than 30 days from the subsequent discovery cut-off date.

20 6. **PRE-TRIAL ORDER.** The Joint Pre-Trial Order shall be filed no later than
21 thirty (30) days after the date set for the filing of dispositive motions: **November 3, 2025.** The
22 disclosures required by FRCP 26(a)(3) and any objections thereto shall be included in the Pre-
23 Trial Order. In the event dispositive motions are filed, the filing of the Pre-Trial Order shall be
24 suspended until thirty (30) days after the Court enters its decision on the dispositive motion, if
25 any.

26 7. **FRCP 26(a)(3) DISCLOSURES.** The disclosures required by FRCP 26(a)(3),
27 and any objections thereto, shall be included in the joint pretrial order.

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1 **8. ALTERNATIVE DISPUTE RESOLUTIONS.** Counsel for the parties certify
2 that they met and conferred about the possibility of using alternative dispute resolution, including
3 mediation, arbitration and/or an early neutral evaluation. The parties agree that an early neutral
4 evaluation would not be effective at this time as the parties and their counsel believe that it is
5 necessary to conduct discovery before attempting to resolve this case. Counsel further agree that
6 a settlement conference or private mediation will be beneficial after discovery is concluded.
7 Finally, the parties and their counsel are not interested in submitting this case to arbitration, at
8 this time.

9 **9. ALTERNATIVE FORMS OF CASE DISPOSITION.** The parties considered
10 consent to trial by magistrate judge under 28 U.S.C. § 626(c) and FRCP 73 and the use of the
11 Short Trial Program, and at this time do not consent to trial by magistrate or the short trial
12 program.

13 **10. ELECTRONIC EVIDENCE.** The parties certified they discussed whether they
14 intend to present evidence in electronic format to jurors, and the parties determined at this time
15 there would not be any. If the parties revisit the presentation of any electronically stored
16 information, they will file the appropriate stipulation with the Court.

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11. EXTENSIONS OR MODIFICATIONS OF THE DISCOVERY PLAN &

SCHEDULING ORDER: Any stipulation or motion must be made no later than 21 days before the subject deadline. Requests to extend discovery deadlines must comply fully with LR 26-3.

DATED this 4th day of February, 2025.

DATED this 6th day of February, 2025.

LADAH LAW FIRM

BARRON & PRUITT, LLP

/s/ Ramzy P. Ladah, Esq.

/s/ Sean DeRoest, Esq.

By: _____

By: _____

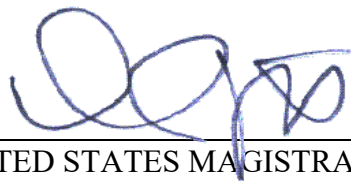
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ORDER

IT IS SO ORDERED.

DATED this 7th day of February, 2025.



UNITED STATES MAGISTRATE JUDGE

LADAH LAW
FIRM

